

WEIL, GOTSHAL & MANGES LLP

Richard W. Slack (*pro hac vice*)

(richard.slack@weil.com)

Jessica Liou (*pro hac vice*)

(jessica.liou@weil.com)

Matthew Goren (*pro hac vice*)

(matthew.goren@weil.com)

767 Fifth Avenue

New York, NY 10153-0119

Tel: (212) 310-8000

Fax: (212) 310-8007

KELLER BENVENUTTI KIM LLP

Jane Kim (#298192)

(jkim@kbbkllp.com)

David A. Taylor (#247433)

(dtaylor@kbbkllp.com)

Thomas B. Rupp (#278041)

(trupp@kbbkllp.com)

650 California Street, Suite 1900

San Francisco, CA 94108

Tel: (415) 496-6723

Fax: (650) 636-9251

Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No.
19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF ANGELA FERRANTE
IN SUPPORT OF REORGANIZED
DEBTORS' TWENTY- FOURTH
SECURITIES CLAIMS OMNIBUS
OBJECTION (NO LOSS CAUSATION –
SECURITIES SOLD PRIOR TO THE FIRST
PURPORTED “CORRECTIVE
DISCLOSURE”)**

**Response Deadline:
September 12, 2023, 4:00 p.m. (PT)**

Hearing Information If Timely Response Made:

Date: September 26, 2023

Time: 10:00 a.m. (Pacific Time)

Place: (Tele/Videoconference Appearances Only)

United States Bankruptcy Court

Courtroom 17, 16th Floor

San Francisco, CA 94102

1 I, Angela Ferrante, hereby declare that the following is true and correct to the best of my
2 knowledge, information, and belief:

3 1. I am a Managing Director of Kroll Settlement Administration LLC, an affiliate of Kroll
4 Restructuring Administration LLC (formerly known as Prime Clerk) (collectively for purposes of this
5 Declaration, “**Kroll**”). In my current role as Managing Director, I am responsible for all business
6 operations including but not limited to securities claims noticing and administration.

7 2. I am providing this Declaration in support of the *Reorganized Debtors’ Twenty-Fourth*
8 *Securities Claims Omnibus Objection (No Loss Causation—Securities Sold Prior to the First Purported*
9 *“Corrective Disclosure”)* (the “**Omnibus Objection**”),¹ filed contemporaneously herewith in the
10 chapter 11 cases (the “**Chapter 11 Cases**”) of PG&E Corporation and Pacific Gas and Electric
11 Company, as debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized**
12 **Debtors**,” as applicable).

13 3. Kroll has been asked by the Reorganized Debtors and their counsel to assist with
14 reviewing and analyzing the claims based on the purchase or acquisition of PG&E securities filed in the
15 Chapter 11 cases. I have over 20 years of experience in class action, legal, and administrative fields. I
16 have personally overseen the administration of some of the most complex class action, regulatory and
17 bankruptcy administrations in the country.

18 4. Except as otherwise indicated herein, all facts set forth in this Declaration are based upon
19 my personal knowledge, the knowledge of other employees working under and alongside me on this
20 matter, my discussions with the Reorganized Debtors’ personnel and the Reorganized Debtors’ various
21 advisors and counsel, and my review of relevant documents and information. If called upon to testify, I
22 would testify competently to the facts set forth in this Declaration. I am authorized to submit this
23 Declaration on behalf of the Reorganized Debtors.

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26 ¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in the
27 Omnibus Objection.
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1 **Identification of Claims Subject to the Omnibus Objection**

2 5. Kroll has been asked by the Reorganized Debtors and their counsel to assist with
3 reviewing and analyzing the claims based on the purchase or acquisition of PG&E securities filed in the
4 Chapter 11 Cases and identifying claims to be included in omnibus objections, including the Omnibus
5 Objection. In furtherance thereof, our team has reviewed and established a database for these claims.
6 The database contains information extracted from proofs of claim and submitted by claimants via an
7 online portal, including, where such details were provided by the claimant, information regarding when
8 such claimant purports to have acquired their position(s) in the Debtors' debt and equity securities that
9 form the basis of the claim.

10 6. Based on our review, we have identified certain claims where the Securities Claimant
11 disposed of its entire position(s) in the Debtors' securities before October 12, 2017. The identified claims
12 are set forth on **Exhibit 1** to the Omnibus Objection, which was prepared by our team under my general
13 supervision, and I am familiar with the documents, their contents, and the process under which **Exhibit**
14 **1** was prepared.

15 7. Specifically, utilizing our proprietary software, we identified claims where the Securities
16 Claimant had purchased or otherwise acquired, and then sold or disposed of, their entire positions in the
17 Debtors' securities before October 12, 2017, and did not purchase the Debtors' securities thereafter.

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1 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and
2 correct to the best of my knowledge, information, and belief.

3
4 Executed August 15, 2023 in New York.

A handwritten signature in blue ink, appearing to read 'Angela Ferrante', is written over a horizontal line.

6 Angela Ferrante
7 Managing Director